

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PAYCARGO FINANCE LP,

CASE NO.: 1:22-cv-22707-KMW

Plaintiff,

vs.

ASPEN AMERICAN INSURANCE
COMPANY,

Defendant,

and

BAY MARITIMES INC.,

Nominal Defendant.

_____ /

**CORRECTED JOINT NOTICE OF SETTLEMENT AND
MOTION TO CANCEL STATUS CONFERENCE**

COME NOW, Plaintiff PAYCARGO FINANCE LP., and Defendant ASPEN AMERICAN INSURANCE COMPANY (collectively the “Parties”), by and through counsel, hereby file this, their Notice of Settlement and state as follows:

1. Pursuant to L.R. 16.4, PCF and Aspen hereby give notice that they have amicably resolved PCF’s claims alleged, or which could have been alleged, in this action.

2. The Parties are currently finalizing and executing the documentation required to effectuate the Settlement, and the Parties anticipate filing a Joint Stipulation for Dismissal within 10 days

3. In light of PCF's and Aspen's settlement of the disputes between them, PCF and Aspen request that the Court vacate and cancel the in-person status conference set for Wednesday, May 8, 2024, at 10:00 a.m.

RESPECTFULLY submitted on this day, May 7, 2024.

XANDER LAW GROUP, P.A.

/s/Jose Teurbe-Tolon

Marcus Tan

(Fla. Bar No.: 38616)

marcus@xanderlaw.com

Jose Teurbe-Tolon

(Fla. Bar No.: 87791)

jose@xanderlaw.com

25 S.E. 2nd Avenue, Suite 808

Miami, FL 33131

Telephone: (305) 767-2001

Fax: (855) 926-3370

service@xanderlaw.com

*Attorneys for Plaintiff, PayCargo
Finance LP*

GURLEY ♦ FANT

/s/ Michael A. Fant

David E. Gurley

(Fla. Bar No.: 0402214)

dgurley@gurleyfant.com

Michael A. Fant

(Fla. Bar No.: 0100713)

mfant@gurleyfant.com

PO Box 2312

Sarasota, FL 34230

Telephone: (941) 365-4501

Facsimile: (941) 365-2916

eservice@gurleyfant.com

*Attorneys for Defendant, Aspen
American Insurance Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof was served upon the following parties/counsel via the Court's CM/ECF on May 7, 2024.

GURLEY ♦ FANT

David E. Gurley
(Fla. Bar No.: 0402214)
dgurley@gurleyfant.com
Michael A. Fant
(Fla. Bar No.: 0100713)
mfant@gurleyfant.com

PO Box 2312
Sarasota, FL 34230
Telephone: (941) 365-4501
Facsimile: (941) 365-2916
eservice@gurleyfant.com
Attorneys for Defendant, Aspen American Insurance Company

By: /s/Jose Teurbe-Tolon

Jose Teurbe-Tolon, Esq.